

## UNITED STATES DISTRICT COURT

for the

2023 JAN 17 PM 2:22

District of \_\_\_\_\_

DEPUTY CLERK *[Signature]*

Division \_\_\_\_\_

4 - 23 CV - 059 - P

Case No. \_\_\_\_\_

(to be filled in by the Clerk's Office)

## Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Jury Trial: (check one)  Yes  No

## Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names. Do not include addresses here.)

## COMPLAINT FOR VIOLATION OF CIVIL RIGHTS

(Non-Prisoner Complaint)

## NOTICE

Federal Rules of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Except as noted in this form, plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

In order for your complaint to be filed, it must be accompanied by the filing fee or an application to proceed in forma pauperis.

**I. The Parties to This Complaint****A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name \_\_\_\_\_

Address \_\_\_\_\_

County \_\_\_\_\_

Telephone Number \_\_\_\_\_

E-Mail Address \_\_\_\_\_

*Sheila Anthony - Brown  
5108 Hawkeye Court Lot # 70  
Fort Worth, Texas 76119*

City \_\_\_\_\_ State \_\_\_\_\_ Zip Code \_\_\_\_\_

*817-353-1111  
sheilanthony05@gmail.com*

**B. The Defendant(s)**

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known) and check whether you are bringing this complaint against them in their individual capacity or official capacity, or both. Attach additional pages if needed.

Defendant No. 1

Name \_\_\_\_\_

Job or Title (*if known*) \_\_\_\_\_

Address \_\_\_\_\_

City \_\_\_\_\_

State \_\_\_\_\_

Zip Code \_\_\_\_\_

County \_\_\_\_\_

Telephone Number \_\_\_\_\_

E-Mail Address (*if known*) \_\_\_\_\_

Individual capacity  Official capacity

Defendant No. 2

Name \_\_\_\_\_

Job or Title (*if known*) \_\_\_\_\_

Address \_\_\_\_\_

City \_\_\_\_\_

State \_\_\_\_\_

Zip Code \_\_\_\_\_

County \_\_\_\_\_

Telephone Number \_\_\_\_\_

E-Mail Address (*if known*) \_\_\_\_\_

Individual capacity  Official capacity

**SERVICING ADDRESSES**

**Defendant No 1**

Jefferson Dental Clinic is the assumed and /or common name of dental clinic located at 6250 Rufe Snow Dr North Richland Hills Texas. At all ties to the relevant to this cause of action Jefferson Dental Clinic was owned by Jefferson Dental Clinic, P.C and JDC Healthcare Management, LLC

Jefferson Dental Clinic, P.C

Registered Agent Rebecca L. Tomlinson

3030 LBJ Freeway, suite 1400

Dallas Texas 75234

**Defendant No 2**

Yuexi Chen DDS

4035 Huffines Blvd apt 3307      Alternate address      1358 Sandhurst Dr

Carrolton Texas 75010      Roanoke Texas 76262

**Defendant No 3**

Klar C. Henry & Nesta Family Partnership owner of property located at 6250 Rufe Snow Dr.

North Richland Hills Texas 76180

Registered Agent Sw&W Registered Agents, Inc

1211 SW Fifth Avenue suite 1900

Portland Oregon 97204

**Defendant No 4**

North Richland Hills Police Department

4301 City Point Dr

North Richland Hills Texas 76180

Phone number 817-427-7000

Defendant No 5

District Attorney Larry Moore

401 West Belknap

Fort Worth Texas 76196

Tarrant County

Phone number 817-884-1673

Email address [lmoore@tarrantcountytexas.gov](mailto:lmoore@tarrantcountytexas.gov)

## Defendant No. 3

Name \_\_\_\_\_

Job or Title (*if known*) \_\_\_\_\_Address \_\_\_\_\_  
\_\_\_\_\_

City \_\_\_\_\_

State \_\_\_\_\_

Zip Code \_\_\_\_\_

County \_\_\_\_\_

Telephone Number \_\_\_\_\_

E-Mail Address (*if known*) \_\_\_\_\_ Individual capacity     Official capacity

## Defendant No. 4

Name \_\_\_\_\_

Job or Title (*if known*) \_\_\_\_\_Address \_\_\_\_\_  
\_\_\_\_\_

City \_\_\_\_\_

State \_\_\_\_\_

Zip Code \_\_\_\_\_

County \_\_\_\_\_

Telephone Number \_\_\_\_\_

E-Mail Address (*if known*) \_\_\_\_\_ Individual capacity     Official capacity**II. Basis for Jurisdiction**

Under 42 U.S.C. § 1983, you may sue state or local officials for the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” Under *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. Are you bringing suit against (*check all that apply*): Federal officials (a *Bivens* claim) State or local officials (a § 1983 claim)

## B. Section 1983 allows claims alleging the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” 42 U.S.C. § 1983. If you are suing under section 1983, what federal constitutional or statutory right(s) do you claim is/are being violated by state or local officials?

C. Plaintiffs suing under *Bivens* may only recover for the violation of certain constitutional rights. If you are suing under *Bivens*, what constitutional right(s) do you claim is/are being violated by federal officials?

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D. Section 1983 allows defendants to be found liable only when they have acted “under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia.” 42 U.S.C. § 1983. If you are suing under section 1983, explain how each defendant acted under color of state or local law. If you are suing under *Bivens*, explain how each defendant acted under color of federal law. Attach additional pages if needed.

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### III. Statement of Claim

State as briefly as possible the facts of your case. Describe how each defendant was personally involved in the alleged wrongful action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

A. Where did the events giving rise to your claim(s) occur?

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B. What date and approximate time did the events giving rise to your claim(s) occur?

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C. What are the facts underlying your claim(s)? (For example: *What happened to you? Who did what? Was anyone else involved? Who else saw what happened?*)

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**III Statement of claim**

**Defendant No.1**

**Jefferson Dental Clinic, P.C., JDC Healthcare Management, LLC d/b/a Jefferson Dental Clinic**

**Yuexi Chen D.D.S**

Jefferson Dental located at 6250 Rufe Snow Dr. North Richland Hills Texas 76180 on March 8,2021

My visit to the office was to have (1) cavity repaired on tooth # 27

1. In consultation with Dr. Chen, she stated that my insurance (MetLife) did not cover caps and I needed to pay full price of 476.00 she stated there is "no cavity" her recommendation was a cap on tooth #27
2. I complained to Dr. Chen about pain in treatment, I was told that if I wanted to not be in pain, I would have to pay another 100.00 and it would have to be paid for right then and asked for my card.
3. I requested the office manager in which I met Office manager (Tyler Bennett) and he confirmed that I would have to pay another 100.00 to have laughing gas (nitrous oxide) he stated he would allow payment on my departure.
4. I was administered laughing gas (nitrous oxide) by Dr. Chen and assistant, and they walked away with gas being administered leaving me alone.
5. Dr. Chen did not document the time of start of nitrous oxide; no documentation of during nitrous oxide; no documentation of stopping of nitrous oxide.
6. I was left for hours inhaling nitrous oxide for hours until Dr. Chen gave treatment to every patient in the building and made to be last patient of this day.
7. In my observation of employees on this day it was fully staffed. How did no one see me laying there how no one said anything about me laying there for hours inhaling this harmful gas.
8. Unknowing of the time, I could hear voices and Dr. Chen putting her fingers in my mouth saying, "she is not a normal person", three times while she was treating me.
9. I began to cry and say you are hurting me, please you are hurting me. They ignored my pleas of pain.

10. I hit Dr. Chen
11. Dr. Chen irritably stated you could get into serious trouble for hitting me and to not raise my hands again, I was advised by Dr. Chen to hold on to the arms of the chair and not to lift my hands again.
12. Dr. Chen told the assistant to hold my head down and still and to turn the gas all the way up.  
\*No documentation of amount, start during or finished.
13. The assistant placed the palms of his hands on my head holding my head down and using his fingers to hold my mouth open.  
\*No authorization to be restrained
14. My body started jerking uncontrollably, my legs straight in the air, my feet facing the ceiling.
15. I remember screaming out "Somebody help me".
16. My body jerking uncontrollably much worse than before, bombs going off in my head, big burst of balls of red, I can't see anything but bombs bursting, he is holding me down everything on my entire body jerking, the assistant using more force to hold me down and still by my head.
17. Dr. Chen running the drill at the highest possible speed, and it is much louder.
18. Dr. Chen states "she is not a normal person" 2nd time
19. Dr. Chen started complaining, stating that she had something important to do and I was a difficult patient. The assistant stated his wife called him and she had to work late, and he must go pick up the kid or kids from daycare.
20. Dr. Chen was still drilling no matter how I cried and screamed and moaned. The assistant not letting go.
21. The assistant tells Dr. Chen that's enough, Dr. Chen got upset and replied to him "you don't tell me nothing I know what I am doing, at this point my body is no longer jerking but burning in my mouth and a horrible smell, Dr. Chen was burning me with the drill inside the tooth.
22. Dr. Chen continued to drill at high speed.
23. The assistant applied more pressure to my head to hold me still and down

24. I told Dr. Chen burn, burning you are burning me. (I was again ignored)
25. Dr. Chen dropped an instrument (looking like a tiny mirror) on the floor and asked the assistant for another one, he stated they are all in the autoclave being cleaned. Dr. Chen then put the instrument in my mouth saying, "she is not a normal person". 3<sup>rd</sup> time
26. Dr. Chen advised if something is wrong with the cap not to see another dentist come back to her and if she is not there having the office to page her and only see her.
27. Dr. Chen advised the assistant to show me out and make sure to have me sign medical release.
28. The assistant asked "Ms. Brown" we are closed is there anything else we can help you with, I said no and standing and fell back into seat. (I do remember the office being crowded with patients. It is my belief that Dr. Chen and the staff left me on laughing gas (nitrous oxide) until they finished taking care of all other patients purposely to torture me therefore no one could come to my aide. I screamed for help. They made me last.
29. No documentation of oxygen given after hours of inhaling nitrous oxide.
30. No documentation of at any time removal of nitrous oxide from approximately 1:30pm until 6pm
31. I was found in the parking lot of Jefferson Dental unconscious next to my car by North Richland Hills Fire Department and Police Department.
32. I was accused of using drugs by North Richland Hills Police and advised that I had to sign release for drug testing or go to jail for public intoxication and if I denied drug test I was going to jail for public intoxication.
33. I was transported to Medical City Hospital via MedStar Ambulance from Jefferson Dental Parking lot.
34. North Richland Hills Police Department escorted me to each treatment area within the hospital, my blood was taken, cat scan done, I was given oxygen and x-rays done for my face (due to swelling) and knot on my head and neck injury.
35. I was told by ER Doctor that findings were high levels of nitrous oxide (laughing gas) and given meds for my injuries of fall head neck right shoulder and right arm and right hand.

36. Clinical Findings: Tooth structure missing on distal surface of #26; advised of presence of caries underneath temp crown, as well as likely need post placement to restore # 27. 27 RCT ANTERIOR (SPEC) Root Canal Note (SPEC) and cavity removed from tooth # 27

37. Loss of tooth #26

38. Loss of tooth #27

39. Diagnosed with PTSD, anxiety, depression hallucination episodes

40. Loss of wages from employment Santander Consumer

41. Outpatient treatment at Texas Health Huguley Hospital for PTSD

42. Recovery Resource EMDR for Trauma Therapy Veteran Services

**STATE BOARD OF DENTAL EXAMINERS INVESTIGATION FINDINGS**

1. Dr. Chen was cited by TSBDE failed to meet minimum standard of care in the treatment of a patient by overpreparing tooth number 27 for a restoration and failing to obtain a signed, written informed consent for a single unit fixed prosthodontic on tooth number 27, in violation of 22 Tex. Admin. Code § 108.7(1). Also, Respondent's records did not include a signed, written informed consent for the restoration on tooth number 27

\*CITATION FROM TSBDE ON FEBUARY 18<sup>TH</sup> 2022

2. Dr. Chen was cited by TSBDE for a preoperative sedation/anesthesia checklist; documentation of the individual Dr. Chen was cited by TSBDE for a preoperative sedation/anesthesia checklist; documentation of the individual present during the administration of nitrous oxide; or an explanation why the items were not recorded as required by 22 Tex. Admin. Code §§ 108.7(1)-(2), (7), 108.8(c)(8), (12), 110.3(b)(1), (c)(5)(B), 110.13.

\*Citation from TSBDE on February 18th, 2022.

III Statement of Claim

**Defendant No 2**

**Dr. Yuexi Chen DDS License No 36365**

Jefferson Dental located at 6250 Rufe Snow Drive in North Richland Hills Texas 76180

My appointment time was 12:30pm on March 8,2021.

My visit to the office was to have (1) cavity repaired on tooth number 27

1. Dr. Chen misdiagnosed tooth number 27 stating that there was no cavity and needed treatment was a cap on tooth 27.
2. Dr. Chen was cited by TSBDE failed to meet minimum standard of care in the treatment of a patient by overpreparing tooth number 27 for a restoration and failing to obtain a signed, written informed consent for a single unit fixed prosthodontic on tooth number 27, in violation of 22 Tex. Admin. Code § 108.7(1). Also, Respondent's records did not include a signed, written informed consent for the restoration on tooth number 27  
\*Citation from TSBDE on February 18<sup>th</sup>, 2022
3. Dr. Chen was advised that treatment was very painful. Dr Chen response was that I would need to pay 100.00 more due to I was too anxious that is why meds were not working, must be paid right then I was asked to give my debit card due to services had to be paid in full before administering nitrous oxide. (Laughing gas) that would be the only way to relieve the pain.
4. I requested the office manager (Tyler Bennett) to explain why I needed to pay another 100.00 to not have the painful procedure done and was told that Dr. Chen will give nitrous oxide and I will have to pay 100.00 after all procedures are finished per manager.
5. Dr. Chen and (male) assistant administered nitrous oxide and walked away I was left on the nitrous oxide until ALL other patients in building were treated and left the facility.
6. Dr. Chen was cited by TSBDE for a preoperative sedation/anesthesia checklist; documentation of the individual present during the administration of nitrous oxide; or an explanation why the items were not recorded as required by 22 Tex. Admin. Code §§ 108.7(1)-(2), (7), 108.8(c)(8), (12), 110.3(b)(1), (c)(5)(B), 110.13.  
Citation from TSBDE on February 18<sup>th</sup>, 2022.

7. Dr. Chen and the assistant complained the entire time about my treatment.
  - (A) Dr. Chen stated that she had something important that she had to do. What time is it?
  - (B) Assistant stated he had to leave cause wife had to work late and he had to go pickup kid or kids
8. Dr. Chen stated to the assistant that "I wasn't a normal person" on three (3) occasions while Dr. Chen was treating me.
9. Dr. Chen and assistant ignored my cries of "you are hurting me" "Please stop" "Please it hurts" "You are hurting me" "please stop". I was crying my body jerking and shaking uncontrollably. My legs straight in the air feet facing the ceiling and Dr. Chen would not stop.
10. I hit Dr. Chen
11. Dr Chen advised me that I could get into serious trouble for hitting her and front that point on to place my hands on the arms of the chair and do not move them again.
12. Dr. Chen dropped utensil on the floor and picked it back up and putting it back into my mouth.
13. Dr. Chen advised me that I need to be still, she has a very sharp tool in her hand, and I could get seriously hurt.
  - (a) I kept saying you are hurting me; it hurts so bad. I can't.
14. Dr. Chen advised the assistant to hold my head still to hold my head down and still but first turn the gas up on high "turn it all the way up" she said.
  - (a) The assistant complied to Dr. Chen's request
  - (b) My entire body jerked and Shaked uncontrollably
  - (c) My brain felt like it was going to burst (explosions bursting in my head)
  - (d) My toenails and fingernails felt like they were being ripped off
15. The Assistant said to Dr. Chen okay that's enough, Dr. Chen irritated replies to assistant you can't tell me nothing, I know what I am doing. Dr. Chen continued to drill and now it is burning. I could smell my flesh burning horrible smell. Dr. Chen continued to drill deeper into my tooth drill at high speed; nitrous oxide still on high I could barely catch my breath.
16. Dr. Chen stated that if I should have any problems not to go see another dentist, only to see her, to call the office and they will contact her, and she will see me.
17. Dr. Chen told the assistant to show her out and make sure she signs a medical release.

18. The assistant and I went to the front of the office their lights were off partially, I held on to the counter where assistant told me to stand and he handed me papers asking me to sign I stated to him sir I can't even write my own name, he replied I can help he pointed to where he requested my signature and I signed as I was walking out I almost fell, he asked are you okay? I just wanted to get out, I kept walking.
19. I was found unconscious by passer byers next to my car at 6250 Rufe Snow Drive North Richland Hills 76180 (Jefferson Dental parking lot) which called The Fire and Police Department @ approximately 16:45pm I was asked "what drugs did I take". "I said I did not take any drugs". They said they were going to give me one more chance to tell the truth again I said, "I don't take drugs". They asked for consent to drug evaluation and I was taken to North Richland Hills Medical City for testing and if I did not pass drug test I was going to jail for public intoxication.
20. Findings from drug test overdosed on nitrous oxide (Laughing gas) treated for fall head injury, neck and back right arm right shoulder. Released from Medical City North Richland Hills on 3/9/2021.
21. Called Jefferson Dental Corporate Office on 3/9/2021 made a formal complaint of what happened to me on 03/8/2021. I was told that they would escalate call to supervisor que, and I would receive a call back. No calls from Jefferson Dental until 06/2/2022
22. In observation of Dr. Chen records of my blood pressure charted 129/101 p.65. Upon my departure I was told to leave, and the office was closed. Dr Chen and anonymous male was negligent in my care.
23. I went to ER on 3/15/2021 for tooth pain and was told to get to a dentist immediately and was given a injection of pain meds
24. Scheduled an appointment with specialist on 3/26/2021

Clinical Findings: Tooth structure missing on distal surface of #26; advised of presence of caries underneath temp crown, as well as likely need post placement to restore # 27. 27 RCT ANTERIOR (SPEC) Root Canal Note (SPEC) and cavity removed from tooth # 27

Loss of tooth # 26

Loss of tooth # 27
25. Requesting Courts to have full investigation of Dr. Chen and assistant for hate crime by State and our Federal Authorities.
26. I was left on Jefferson Dental parking lot @ 6250 Rufe Snow drive North Richland Hills Texas for dead.

**III Statement of Claim**

**Defendant No.3**

**C Henry Klar & Nesta Family Partnership Kenneth Klar**

Owner of property located at 6250 Rufe Snow Dr. North Richland Hills Texas 76180

On March 8,2021 @ approximately 6:30pm I fell on your property

1. I had considerable injury from fall on your property:

Head, neck, right arm, and right shoulder.

2. I was transported by Medstar to Medical City Hospital and treated for injuries.

### III Statement of Claim

#### Defendant No.4

##### North Richland Hills Police Department

March 8,2021 6250 Rufe Snow Dr North Richland Hills Texas 76180

I was found on parking lot of Jefferson Dental unconscienced at 6250 Rufe Snow Dr at approximately 6:30pm by passer byers.

Fire Department and North Richland Hills Police and was told that I need to tell why I was on parking lot after business was closed.

1. Police treatment as a drug user and not a victim with threats of being taken to jail for public intoxication.
2. I was having a medical emergency/ trauma
3. I was told I must sign a release to have drug test done and transported to ER for drug evaluation.
  - (a) After repeatedly asking me, what drugs did, I take I repeatedly told fire department and officers that I did not take anything, I had dental procedure.
  - (b) I was asked to consent to drug test and if drug test came back positive, I was going to jail for public intoxication.
  - (c) I was transported to Medical City Hospital for drug test gave urine and blood test police waited at Hosp room
  - (d) Drug test came back of overdose of nitrous oxide
  - (e) When drug test came back negative for drugs Police asked nurse named Carol to ask me "if I would object to hair follicle test for drugs to cut my hair down to the bas of my hair", I replied "no they can cut my hair I do not use drugs". Dr at dental office did this to me she stated I wasn't a normal person.
  - (f) Police left Hospital without taking report of what happened to me.

4. I returned to police station several times for help and was told that I must take my complaint up with Texas Dental Board but refused to assist into the criminal part of my complaint.
5. On 03/19/2021 I went to Police Department to make formal complaint against Dr Chen and assistant of assault and battery and unlawful restraints.
6. North Richland Hills Police Department were biased and negligent in my complaints.
7. I made a formal report of complaint with Internal Affairs on October 22, 2021, and still no investigation of my complaint. Nothing done.
8. I was given case # 21N15317 then told that North Richland Hills does not have legal authority to investigate or resolve my complaint.
9. On 04/20/2021 North Richland Hills Pollice Department made 1 (one) phone call made to Jefferson Dental and message left.
10. On 04/21/2021 North Richland Hills Police Department made 1 (one) phone call made to Jefferson Dental and message left.
11. On 04/23/2021 Case rejected for any investigation and was directed to District Attorney Larry Moore

\*\* 2 messages left from NRH Police Department.

**III Statement of Claim**

**Defendant No.5**

**District Attorney Larry Moore**

**401 West Belknap Fort Worth Texas 76196 in the month of June of 2021**

Visited District Attorney Larry Moore, I went thru all details of what happened on March 8,2021 at Jefferson Dental and assault and battery and unlawful restraint (being held down by my head) from Dr. Chen and assistant in details asked if he would open case due to injuries and North Richland Hills Police Department informed me that he closed case without investigation for case # 21N15317

1. Mr. Larry Moore confirmed he closed case and refused to reopen case
  - (a) I need to make complaint with Texas Dental Board
  - (b) Dr. can do whatever they want to me
  - (c) I asked to speak with his supervisor he stated he is the supervisor, and no one is above him.
  - (d) Stated he will not open case on hardworking people just because they didn't return a call.
  - (e) Refused to allow investigation of what happened to me on 3/8/2021
  - (f) Refused to allow me to press criminal charges against the dentist and the assistant.
  - (g) Refused to investigate or ask for supporting evidence of surveillance cameras of assault inside.
  - (h) Refused to investigate or ask for surveillance footage on who left me outside on the ground after dental procedure.

**In March of 2022**

I returned to speak with District Attorney Larry Moore, in hand I had statement from Texas Dental Board of Examiners.

1. Proof of disciplinary judgement from TSBDE against Dr. Chen for malpractice, overdose of Nitrous oxide.
2. I asked District Attorney to reconsider opening the criminal case and at least investigate what happened to me on March 8,2021 at Jefferson Dental he refused and stated that I would have to bring them into court.
  - (A) I should have the right to report the crime committed to me and investigation should have been done.
  - (B) District Attorney Moore refused to assist me.
  - (C) Stated the Dr. had the right to do whatever they wanted to me.
3. Mr. Larry Moore, the District Attorney, refused to allow me to file any criminal charges on the individuals involved.

4. Refused to have investigation done of my complaint medical assault with bodily injuries, unlawful restraint, Hate Crime.
5. District Attorney Larry Moore stated the only thing I could do at this point is to file lawsuit on individuals involved.

**IV. Injuries**

If you sustained injuries related to the events alleged above, describe your injuries and state what medical treatment, if any, you required and did or did not receive.

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**V. Relief**

State briefly what you want the court to do for you. Make no legal arguments. Do not cite any cases or statutes. If requesting money damages, include the amounts of any actual damages and/or punitive damages claimed for the acts alleged. Explain the basis for these claims.

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**IV. INJURIES**

**On March 8, 2021, Fell at 6250 Rufe Snow Dr North Richland Hills Texas 76180 Approx 6pm**

**Head**

**Neck**

**Back**

**Right arm**

**Right shoulder**

**Loss of tooth number 27**

**Loss of tooth number 26**

**Loss of income wages**

**Outstanding medical bills**

**Emotional distress**

**Punitive damages**

**Trauma**

**Pain and suffering**

**Diagnosed with PTSD, Post Traumatic Stress Disorder, Anxiety, Hallucination episodes, Depression.**

**(Currently still being Treated).**

**V. Relief**

Jefferson Dental states that they will not take responsibility nor accountability of any parts of claim and do not have contact with the individuals that were working in their facility on March 8, 2021, because they are no longer employed with the company after this incident. I have gone on several occasions to North Richland Hills Police Department for assistance and formal investigation of my claims of the incidents that happened ON March 8, 2021. I was given case # 21N15317. One phone call was made; a message was left. Per North Richland Hills Police Department case was closed and not to investigate my claims per District Attorney Larry Moore I personally visited with The District Attorney Larry Moore and gave directive to close the case and he refused to re-open the case because he will not go after good, hardworking people. District Attorney Larry Moore refused to allow me to file reports of criminal charges and refused to assist in any investigation.

I am at the courts' mercy asking for a full unbiased investigation of all individuals involved in this matter.

I am also asking for assistance for representation I AM NOT OKAY. I am mercies to find out all of what happened and individuals to take responsibility and accountability in negligence of my health and civil rights.

**Jefferson Dental Clinic, P.C and  
Dollars** 3,000,000.00 **Three Million**

**JDC Healthcare Management, LLC**

**Yuxi Chen DDS License No. 36365  
Dollars** 250,000.00 **Two Hundred and Fifty Thousand**

**North Richland Hills Police Department  
Dollars** 150,000.00 **One hundred and Fifty Thousand**

**District Attorney Larry Moore  
Dollars** 150,000.00 **One Hundred and Fifty Thousand**

**Klar C. Henry & Nesta Family -** **50,000.00** **Fifty Thousand**  
**Dollars**

**Partnership**

**Punitive damages** **500,000.00** **Five Hundred Thousand**  
**Pain and Suffering**

**VI. Certification and Closing**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

**A. For Parties Without an Attorney**

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: \_\_\_\_\_

Signature of Plaintiff \_\_\_\_\_

Printed Name of Plaintiff \_\_\_\_\_

**B. For Attorneys**

Date of signing: \_\_\_\_\_

Signature of Attorney \_\_\_\_\_

Printed Name of Attorney \_\_\_\_\_

Bar Number \_\_\_\_\_

Name of Law Firm \_\_\_\_\_

Address \_\_\_\_\_

\_\_\_\_\_ *City* \_\_\_\_\_ *State* \_\_\_\_\_ *Zip Code*

Telephone Number \_\_\_\_\_

E-mail Address \_\_\_\_\_